

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**WILLY MALONE, JEROME WATSON, ROBERT ABREU,
DESIREE WILSON, EVA LEE, OLIVIA WILSON,
SHERRE WILSON, ANGEL HERNANDEZ, NYTRICHA
SMITH and DANIEL PAULINO,**

Plaintiffs,

**Case Number:
07-CV-9583
(LTS) (GWG)**

-against-

**NEW YORK PRESSMEN'S UNION NUMBER 2
and NEWS CORP a.k.a. NYP HOLDINGS d/b/a
THE NEW YORK POST,**

Defendants.

Motion by: Plaintiffs, Willy Malone, Jerome Watson, Robert Abreu,
Desiree Wilson, Eva Lee, Olivia Wilson, Sheree Wilson, Angel
Hernandez, Nytricha Smith, and Daniel Paulino

Date, Time and Place
Returnable: March 20, 2008 at 9:30 a.m. or as soon thereafter as counsel
may be heard, before Hon. Laura Taylor Swain, United States
District Judge, United States Courthouse, 40 Center Street,
New York, New York 10007.

Supporting Papers: Declaration of Jennifer L. DeVenuti, Esq., Plaintiff's
Memorandum of Law in Opposition to Defendant Union's
Motion to Dismiss and in Support of Plaintiffs' Motion for
Leave to File and Serve an Amended Complaint, Plaintiffs'
Original Complaint filed on or about October 26, 2007, and
Plaintiffs' Proposed Amended Complaint.

Relief Requested: An order pursuant to Fed. R. Civ. P. 15 granting Plaintiff leave
to file the attached Amended Complaint.

Opposing Papers To be served on or before March 7, 2008 at the offices of the
undersigned counsel for the Plaintiff.

Dated: Farmingdale, New York
February 19, 2008

FRANK & ASSOCIATES, P.C.
Attorneys for Plaintiffs

By: Jennifer L. DeVenuti
Jennifer L. DeVenuti, Esq. (JD-5778)
Neil M. Frank, Esq. (NF-0251)
500 Bi-County Blvd., Suite 112N
Farmingdale, New York 11375
Telephone: (631) 756-0400
Facsimile: (631) 756-0547

To:
Daniel Engelstein, Esq. (DE-2499)
Levy Ratner, P.C.
Attorneys for Defendant Union
80 8th Avenue, 8th Floor
New York, New York 10011
(212) 627-8100 – Telephone
(212) 627-8182 – Facsimile